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*Wiley, Rein & Fielding*

1776 K Street, N.W.  
Washington, D.C. 20006  
(202) 719-7000

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**Marnie K. Sarver**  
(202) 719-4289  
msarver@wrf.com

Fax: (202) 719-7049  
www.wrf.com

December 8, 1999

Magalie Roman Salas, Secretary  
Federal Communications Commission  
The Portals  
445 Twelfth Street, S.W.  
12th Street Lobby, TW-A325  
Washington, DC 20554

RECEIVED  
DEC 8 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: DTV Channel 4, Macon, Georgia  
PETITION FOR RULE MAKING

Dear Ms. Salas:

On behalf of Gannett Georgia, L.P., licensee of Television Station WMAZ-DT, Macon Georgia, we are submitting herewith, pursuant to Section 73.622(a) of the Commission's rules, an original and four (4) copies of a Petition for Rule Making to change the DTV channel allotted for use by WMAZ-DT from Channel 45 to Channel 4.

If further information is required, please direct inquiries and correspondence to the undersigned.

Sincerely,



Marnie K. Sarver

Enclosures

cc: Mr. Cecil Walker (w/enc.)  
Mr. Craig Dubow (w/enc.)  
Mr. Don McGouirk (w/enc.) [For the Public Inspection File]  
Mr. Lacy Worrell (w/enc.)  
David P. Fleming, Esq. (w/enc.)  
Mr. Jeff Andrew (w/enc.)

File of Cecil Walker 042  
LBI ARCHIVE

ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

RECEIVED

DEC 8 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Section 73.622(b) of ) MM Docket No.  
the Commission's Rules, DTV ) RM No.  
Table of Allotments )  
(Macon, Georgia) )

To: Chief, Allocations Branch

**PETITION FOR RULEMAKING**

1. Gannett Georgia, L.P. ("Gannett"), by its attorneys and pursuant to Section 73.623 of the Commission's rules, 47 C.F.R. §73.623, hereby requests that the Commission institute a rulemaking proceeding for the purpose of amending the Table of Allotments for the digital television service ("DTV Table") to change the initial DTV channel allotment for station WMAZ-DT, Macon, Georgia, from channel 45 to channel 4.<sup>1</sup>

2. Gannett is the licensee of television station WMAZ-TV, Macon, Georgia, which currently operates on NTSC channel 13. The station has been allotted DTV channel 45 for its digital operations, with authorized power of 1,000 kilowatts.

3. Gannett proposes to amend the DTV Table of Allotments to substitute channel 4 in place of channel 45 at Macon, for the use of WMAZ-DT. As demonstrated in the attached engineering exhibit, channel 4 can be used at the WMAZ-DT reference coordinates with a

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<sup>1</sup> On October 26, 1999, Gannett requested an extension of time to submit its application for DTV construction permit pending the outcome of the proceeding being proposed herein.

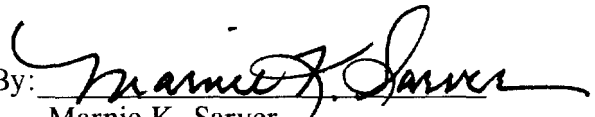
non-directional antenna, at 5 kilowatts effective radiated power. Operations on channel 4 would meet the Commission's 2% / 10% *de minimis* interference limits regarding DTV proposals. See Section 73.623(c)(2) of the Commission's rules, 47 C.F.R. §73.623(c)(2).

4. As further set forth in the engineering statement, DTV operations on channel 4 at Macon would provide coverage to over 100 percent of the population-limited area provided by WMAZ-TV NTSC channel 13. Moreover, the power utility and other expenses of a VHF DTV facility would be reduced from that of a comparable UHF DTV facility. In particular, significant cost savings would result from operation with 5 kilowatts, as opposed to 1000 kilowatts, that could be directed to programming and other services to benefit the public.

5. In light of the foregoing, Gannett respectfully requests that the Commission commence a rulemaking proceeding to amend the DTV Table of Allotments to allot and assign DTV channel 4 (in lieu of channel 45) to Macon, Georgia, for use by WMAZ-DT.

Respectfully submitted,

**GANNETT GEORGIA, L.P.**

By:   
Marnie K. Sarver

WILEY, REIN & FIELDING  
1776 K Street, NW  
Washington, DC 20006  
(202) 719-7000

Its Attorneys

December 8, 1999

## ENGINEERING STATEMENT

prepared for

**Gannett Georgia, L.P.**

WMAZ-DT Macon, Georgia

This engineering statement has been prepared on behalf of *Gannett Georgia, L.P.*, in support of a *Petition for Rulemaking*. In the Federal Communications Commission's Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders on Advanced Television,<sup>1</sup> DTV Channel 45 was allotted as a "paired" channel for the WMAZ-TV analog Channel 13. A substitute DTV channel is proposed herein for WMAZ-DT.

### Discussion

An engineering review of the DTV allotments and NTSC assignments in the region surrounding Macon showed that a VHF channel could be used for WMAZ-DT in lieu of the allotted UHF channel. Detailed interference studies were conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission's Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, July 2, 1997 ("OET-69").<sup>2</sup> The studies showed that Channel 4 could be used for WMAZ-DT at 5 kW effective radiated power (ERP), with a non-directional antenna. DTV Channel 4 at Macon would provide coverage to over 100 percent of the population of the interference-limited area provided by WMAZ-TV NTSC Channel 13.

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<sup>1</sup>See MM Docket 87-268, *Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service*, FCC 98-315, released December 18, 1998.

<sup>2</sup>The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein, except that the terrain profile step size is 0.1 km (which provides a finer resolution than the Commission's standard 1 km step size). A standard cell size of 2 km was used. The Longley-Rice computer program input data, following the guidelines established under OET-69, includes a location variability of 50%, a time availability of 10%, a situation variability of 50%, horizontal polarization, 0.005 S/m conductivity, a climate constant of 15, an assumption of a continental temperate climate zone, and a receive antenna height of 10 meters. The service area for each DTV facility under study is that area predicted to receive signal levels of at least 28 dB $\mu$  using the Longley-Rice methodology, and within the DTV F(50,90) 28 dB $\mu$  service contour distance as determined per §73.625(b). In instances where the DTV reference ERP is 1.0 kW, the Grade B contour of the associated analog station (authorized as of April 3, 1997) is used to determine the extent of the DTV station's service area. The service area for each NTSC facility under study is that area predicted to receive signal levels of at least 47 dB $\mu$  using the Longley-Rice methodology, and within the NTSC F(50,50) 47 dB $\mu$  Grade B contour distance as determined per §73.684(c). Comparisons of various results of this computer program to the Commission's implementation of OET-69 show good correlation.

## ENGINEERING STATEMENT

(page 2 of 3)

All stations considered in this study are listed in the attached **Table 1**. The results of the interference study, also summarized in **Table 1**, indicate that any additional interference to these stations meets the Commission's 2% / 10% interference limits regarding DTV proposals. Thus, this proposal is believed to be in compliance with the provisions of §73.623(c)(2) of the Commission's rules.

The technical data for the proposed Channel 4 allotment is summarized below. The location and antenna height are the same as that for the current DTV Channel 45 allotment for WMAZ-DT.

### Summary Technical Data for Proposed DTV Channel 4 Substitution Macon, Georgia

Coordinates (NAD-27)	32° 45' 10" N-Lat 83° 33' 32" W-Lon
Channel	4
Effective Radiated Power	5 kW (non-directional)
Antenna Height	352 m AMSL 238 m HAAT

### Summary

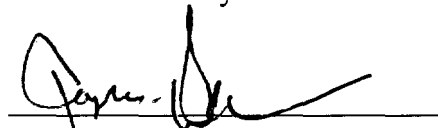
It is proposed that WMAZ-DT Macon, Georgia be permitted to substitute DTV Channel 4 in lieu of the allotted DTV Channel 45. Over 100 percent replication of the population coverage of the existing WMAZ-TV NTSC Channel 13 will be provided. Any interference caused to other DTV allotments or NTSC assignments meets the Commission's 2% / 10% *de minimis* limits. The power utility and other operating expenses of a 5 kW VHF DTV facility will be reduced from that of a comparable UHF DTV facility.

## ENGINEERING STATEMENT

(page 3 of 3)

### Certification

Under the penalty of perjury, the undersigned hereby certifies that the foregoing statement was prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief. Mr. Davis is a principal in the firm of *Cavell, Mertz & Davis, Inc.*, is a Registered Professional Engineer in Virginia, holds a Bachelor of Science degree from Old Dominion University in Electrical Engineering Technology, and has submitted numerous engineering exhibits to various local governmental authorities and the Federal Communications Commission. His qualifications are a matter of record with that entity.

A handwritten signature in black ink, appearing to read "Joseph M. Davis", is written over a horizontal line.

Joseph M. Davis, P.E.  
November 29, 1999

Cavell, Mertz & Davis, Inc.  
10300 Eaton Place Suite 200  
Fairfax, VA 22030  
(703) 591-0110

Table 1  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
 prepared for  
**Gannett Georgia, L.P.**  
 WMAZ-DT Macon, Georgia

<u>Stations Considered</u>	<u>City, State Channel, Type</u>	<u>Distance (km)</u>	<u>Baseline Population (1)</u>	<u>Initial Interference Percentage (2)</u>	<u>Additional Interference Percentage (3)</u>	<u>Proposed Change in Interference Population (4)</u>	<u>Proposed Change in Interference Percentage (5)</u>	<u>Final Interference Percentage (6)</u>
WRBL (TV) (Lic)	Columbus, GA 3 NTSC	124.1	1,334,726	0.5	0.0	23,421	1.8	2.3
WSAV-TV (Lic)	Savannah, GA 3 NTSC	226.1	----- no interference predicted from proposal -----					
WCIQ-DT (Proposed)*	Mount Cheaha, AL 4 DTV	225.2	2,002,542	n/a	n/a	29,715	1.5	1.5
WYFF (TV) (Lic)	Greenville, SC 4 NTSC	276.1	2,190,884	0.0	0.0	16,632	0.8	0.8
WTVY (TV) (Lic)	Dothan, AL 4 NTSC	289.8	828,515	0.0	0.0	4,953	0.6	0.6
WJXT (TV) (Lic)	Jacksonville, FL 4 NTSC	334.5	1,210,281	0.0	0.0	5	0.0	0.0

Table 1  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
 (page 2 of 2)

<u>Stations Considered</u>	<u>City, State Channel, Type</u>	<u>Distance (km)</u>	<u>Baseline Population (1)</u>	<u>Initial Interference Percentage (2)</u>	<u>Additional Interference Percentage (3)</u>	<u>Proposed Change in Interference Population (4)</u>	<u>Proposed Change in Interference Percentage (5)</u>	<u>Final Interference Percentage (6)</u>
WCIV (TV) (Lic)	Charleston, SC 4 NTSC	361.8	893,421	0.0	0.0	0	---- no change in interference ---	

Notes:

- (1) For DTV stations, greater of NTSC or DTV Service Population, from FCC Table  
For NTSC stations, total population within noise-limited contour
- (2) For DTV stations, 100 percent minus FCC Table initial DTV/NTSC population match  
For NTSC stations, initial percent loss: percent of population within (1) predicted to receive DTV only interference from FCC Table
- (3) Additional interference experienced due to DTV facilities authorized subsequent to initial allotment table
- (4) Net change in population receiving interference resulting from proposal; numbers in parenthesis indicate a *reduction* in interference
- (5) Proposal's impact in terms of percentage, equals (4)/(1) times 100 percent: not to exceed *de minimis* limit of 2.0 percent
- (6) Total interference: equals (2) + (3) + (5); proposal may not increase (2) + (3) above 10 percent

The determination of stations for consideration and the determination of baseline population and interference percentages were made as described in the Commission's August 10, 1998 Public Notice "*Additional Application Processing Guidelines for Digital Television*"

\* DTV Channel 4 for WCIQ at Mount Cheaha, AL is proposed by that station's licensee as an alternative from its assigned DTV Channel 56. The baseline population shown for the proposed WCIQ DTV facility is its proposed DTV Channel 4 service population as determined before consideration of the instant WMAZ proposal.